

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v. -

JAMAL WATSON a/k/a "Jiggles",  
a/k/a "Cedric",  
PERRY WELLS,  
STEVE CAMPBELL,  
KARL DUNCAN,  
ALBERT MCDUFFIE, a/k/a "Alley  
Cat",  
SILVESTRE MAHON, a/k/a  
"Kito",  
ROBERT CHERRY,  
LEO RUSS, and  
RUSSELL COOK,

Defendants.

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COUNT ONE

The Grand Jury charges:

1. From at least in or about October 2016, up to and including the present, in the Southern District of New York and elsewhere, JAMAL WATSON a/k/a "Jiggles", a/k/a "Cedric", PERRY WELLS, STEVE CAMPBELL, KARL DUNCAN, ALBERT MCDUFFIE, a/k/a "Alley Cat", SILVESTRE MAHON, a/k/a "Kito", ROBERT CHERRY, LEO RUSS, and RUSSELL COOK, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: MAR 25 2019
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SEALED  
INDICTMENT

19 Cr. **19 CRIM 212**

JUDGE CAPRONI

JAMAL WATSON a/k/a "Jiggles", a/k/a "Cedric", PERRY WELLS, STEVE CAMPBELL, KARL DUNCAN, ALBERT MCDUFFIE, a/k/a "Alley Cat", SILVESTRE MAHON, a/k/a "Kito", ROBERT CHERRY, LEO RUSS, and RUSSELL COOK, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that JAMAL WATSON a/k/a "Jiggles", a/k/a "Cedric", PERRY WELLS, STEVE CAMPBELL, KARL DUNCAN, ALBERT MCDUFFIE, a/k/a "Alley Cat", SILVESTRE MAHON, a/k/a "Kito", ROBERT CHERRY, LEO RUSS, and RUSSELL COOK, the defendants, conspired to distribute and possess with intent to distribute was 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

**FORFEITURE ALLEGATION**

4. As a result of committing the offense alleged in Count One of this Indictment, JAMAL WATSON a/k/a "Jiggles", a/k/a "Cedric", PERRY WELLS, STEVE CAMPBELL, KARL DUNCAN, ALBERT MCDUFFIE, a/k/a "Alley Cat", SILVESTRE MAHON, a/k/a "Kito", ROBERT CHERRY, LEO RUSS, and RUSSELL COOK, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or

derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

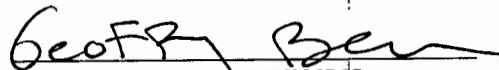
5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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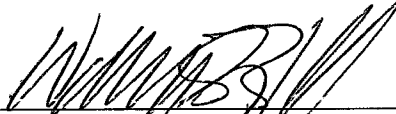
INDICTMENT

19 Cr. \_\_\_\_

(21 U.S.C. § 846.)

GEOFFREY S. BERMAN

United States Attorney



FOREPERSON

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03/25/19  
(CA) SEALED INDICTMENT FILED  
W/ARREST WARRANTS  
KH PARKER  
USRT